

**IN THE DRAWINGS:**

The Applicant respectfully presents herewith replacement Figs. 20-29 and 31-34 which include the desired changes, without markings, and which comply with 1.84.

## **REMARKS**

Claims 1-6, 8-13, 22-27, 29-34, 43-54 and 59-62 are pending in this application and subject to consideration. Claims 14-21, 35-42 and 55-58 have been previously withdrawn from consideration. Reconsideration of the application is respectfully requested in view of the following remarks.

### **Information Disclosure Statement**

The Office Action of February 18, 2009, on page 4, asserts the Information Disclosure Statement (IDS) filed January 9, 2009 "fails to comply with 37 CFR 1.98(a)(2), which requires a legible copy of each cited foreign patent document; [and] each non-patent literature publication or that portion which caused it to be listed." However, the Applicants respectfully submit the IDS filed January 9, 2009 was proper and did include a copy of the cited foreign patent document and non-patent literature.

The Applicants respectfully submit that the file wrapper for this Application in the Private PAIR database on the U.S. Patent and Trademark Website indicates that the foreign reference and two non-patent literature references were saved into the file wrapper on January 9, 2009.

Accordingly, the Applicants respectfully request the Examiner consider the lined through references listed on the January 9, 2009, IDS.

### **Drawings**

The Office Action objects to figures 20-29 and 31-34 as not being legible. Replacement Figures 20-29 and 31-34 are being submitted herewith to obviate the objection.

Accordingly, the Applicants respectfully request the Examiner withdraw the objection to the drawings.

**Priority**

The Office Action, on page 3, asserts that the claim for priority is improper because the prior-filed applications "fail to provide adequate support or enablement in the manner provided by the first paragraph of 35 U.S.C. 112 for one or more claims of this application." However, the Applicants respectfully submit the claim for priority is proper under 35 U.S.C. 120 and at least a portion of the features recited in the claims of the present Application are supported in the priority applications.

Applicants respectfully submit the present application is a continuation-in-part of U.S. Patent Application No. 08/336,247, now U.S. Patent No. 5,986,690 ('690 Patent), filed November 7, 1994. (See Page 1, lines 3-5 of the Specification originally filed). Further, the Applicants respectfully submit the '690 Patent does provide support for at least "selecting an electronic book for viewing from a list of available electronic books stored in an operations center; displaying a page of the selected electronic book on the viewer, the page including text, wherein the operations center is remote from the viewer," as recited in claim 1 of the present Application.

To further clarify the support for the currently pending claims found in the '690 Patent, the Applicants point to the '690 Patent, which discloses, at least in Fig. 2 and col. 3, line 60-col. 4, line 6, that the operation center is remote from the viewer and that "the operations center creates a pool of textual material that is available to be delivered to the home subsystem. Normally, the text material is grouped by books or titles for easy access." In addition, at least Figs. 14e, 14s and 14t and col. 14, lines 36-38 of the

'690 Patent disclose selecting a book for viewing from a list of available books and "when a book is finally selected for viewing on the system it will appear on the screen as shown in FIG. 14s for the title and FIG. 14t for a page of text."

For at least the above reasons, the Applicants submit the '690 Patent does provide support for at least "selecting an electronic book for viewing from a list of available electronic books stored in an operations center; displaying a page of the selected electronic book on the viewer, the page including text, wherein the operations center is remote from the viewer," as recited in claim 1. For similar reasons, the Applicants submit the '690 Patent does provide support for at least claims 8, 11, 22, 29, 32, 43 and 51.

Therefore, the Applicants respectfully submit that at least a portion of the features recited in the claims of the present Application are supported in the priority applications.

Accordingly, the Applicants respectfully submit the claim for priority is proper under 35 U.S.C. 120 and request the benefit of the priority Applications.

#### **35 U.S.C. §102(b) Rejection**

The Office Action rejects claims 51-55 under 35 U.S.C. 102(b) as being anticipated by Huffman et al. (U.S. Patent No. 5,663,748). The Applicants respectfully traverse the rejections as follows.

The Applicants submit that Huffman does not teach or suggest a screen for use in electronically displaying a page of an electronic book on a viewer and permitting a user to request a text-to-audio function, including at least the following combination of features: "a first section within the screen for selecting an electronic book for viewing

from a list of available electronic books stored in an operations center; a second section within the screen for displaying a page of the selected electronic book, the page including text and the section permitting a user to identify at least a portion of the text displayed within the screen, wherein the operations center is remote from the viewer; and a third section within the screen for permitting the user to request a text-to- audio conversion of the identified text," as recited in claim 51.

As discussed above, U.S. Patent No. 5,986,690, to which the present application claims priority, provides support for at least "a first section within the screen for selecting an electronic book for viewing from a list of available electronic books stored in an operations center; a second section within the screen for displaying a page of the selected electronic book... wherein the operations center is remote from the viewer," as recited in claim 51.

Accordingly, the Applicants respectfully submit that Huffman is not a proper prior art reference for at least these features of claim 51 because the Application claims priority to U.S. Patent No. 5,986,690 ('690 Patent) filed on November 7, 1994, which predates Huffman.

Thus, the Examiner has not provided a *prima facie* case of anticipation since Huffman is not a proper prior art reference for the features recited in claim 51.

For at least the above reasons, the Applicants submit that claim 51 is allowable over the cited references.

As claim 51 is allowable, the Applicants submit that claims 52-54, which depend from claim 51, respectively, are likewise allowable over the cited references, as well as for the additional features recited therein.

### **35 U.S.C. §103(a) Rejections**

The Office Action rejects claims 1-5, 8-13, 22-26, 29-34, 43-50, and 59-62 under 35 U.S.C. § 103(a) as being obvious over Quentin et al. (U.S. Patent No. 5,208,745) in view of Sears et al. (U.S. Patent No. 6,115,482); and claims 6 and 27 under 35 U.S.C. § 103(a) as being obvious over Quentin in view of Sears, and further in view of Huffman et al. (U.S. Patent No. 5,663,748). The Applicants respectfully traverse the rejections as follows.

The Applicants respectfully submit that Quentin, Sears and Huffman, alone or in combination, do not teach or suggest a method for providing text-to-audio conversion of an electronic book displayed on a viewer, the method including at least the following combination of features: “selecting an electronic book for viewing from a list of available electronic books stored in an operations center; displaying a page of the selected electronic book on the viewer, the page including text, wherein the operations center is remote from the viewer; receiving a selection of text on the displayed page to be provided in audio; and providing at least a portion of the selected text in corresponding audio,” as recited in claim 1.

Quentin, in col. 3, lines 25-30, discloses “a knowledge-based system designed to aid maintenance electricians when troubleshooting gas turbine power plant control systems.” However, Quentin does not disclose or suggest “a list of available electronic books stored in an operations center,” as recited in claim 1. In contrast, Quentin discloses, in col. 4, lines 33-60, “a knowledge base 52 (i.e., a database of information)” where “the expert system software module 54, sometimes called an inference engine, interprets the user’s key-board and voice inputs and selects a new set of information

from the knowledge base 52.” Thus, Quentin discloses an inference engine that searches a database for a new set of information not “selecting an electronic book for viewing from a list of available electronic books stored in an operations center,” as recited in claim 1.

Moreover, the Office Action, on page 5, admits that Quentin does not “explicitly teach where the electronic text materials are books” and relies on Sears to cure this deficiency.

Sears, in the Abstract and col. 4, line 66-col. 5, line 2, discloses “an optical-input print reading device...which decodes the text images into their symbolic meanings through optical character recognition” where “the printed material can be text in a variety of formats...including books [and] magazines.” However, Sears does not disclose or suggest “selecting an electronic book for viewing from a list of available electronic books stored in an operations center,” as recited in claim 1. In contrast, Sears, in col. 5, lines 45-57, discloses “the user places printed information into the field of view of the camera assembly...during an image capture step, the image is read by the image sensor...[and] the image is converted into its text representation in an optical character recognition step.” Therefore, Sears discloses capturing a single page of text by an image sensor, not “selecting an electronic book for viewing from a list of available electronic books stored in an operations center,” as recited in claim 1.

As discussed above, the Applicants respectfully submit that Huffman is not a proper prior art reference for at least these features of claim 1 because the Application claims priority to U.S. Patent No. 5,986,690 ('690 Patent) filed on November 7, 1994, which predates Huffman.

For at least the above reasons, the Applicants submit that claim 1 is allowable over the cited references. For similar reasons, the Applicants submit that claims 8, 11, 22, 29, 32 and 43 are also allowable over the cited references.

As claims 1, 8, 11, 22, 29, 32 and 43 are allowable, the Applicants submit that claims 2-6, 9-10, 12-13, 23-27, 30-31, 33-34, 44-50, and 59-62, which depend from claims 1, 8, 11, 22, 29, 32 and 43, respectively, are likewise allowable over the cited references, as well as for the additional features recited therein.

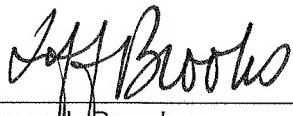
**Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-6, 8-13, 22-27, 29-34, 43-54 and 59-62 are earnestly solicited.

Should the Examiner determine that any further action is necessary to place this application into better form, the Examiner is encouraged to telephone the undersigned representative at the number listed below.

In the event this paper is not considered to be timely filed, the Applicants hereby petition for an appropriate extension of time. Any fees for such an extension, together with any additional fees that may be due with respect to this paper, may be charged to counsel's Deposit Account No. 01-2300, **referencing Attorney Dkt. No. 026880-00014.**

Respectfully submitted,

  
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Enclosures: Replacement Figs. 20-29 and 31-34